

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

W. MICHAEL CAHILL,

Plaintiff,

v.

VERIZON, SYSTEM COUNCIL T6/LOCAL  
2222 IBEW,

Defendants.

CIVIL ACTION No. 04-11986-MEL

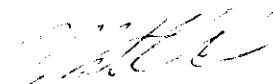
**DEFENDANT VERIZON'S MOTION FOR LEAVE TO FILE A REPLY TO THE  
PLAINTIFF'S MEMORANDUM OF FACTS IN OPPOSITION TO VERIZON'S  
MOTION TO DISMISS**

Defendant Verizon New England Inc. ("Verizon") hereby moves, pursuant to Local Rule Civ. P. 7.1(B)(3), for leave to file a reply to W. Michael Cahill's Memorandum of Facts in Opposition to Verizon's Motion to Dismiss. In support of its motion, Verizon relies upon the accompanying reply filed herewith.

WHEREFORE, Verizon respectfully requests leave to so file.

VERIZON NEW ENGLAND INC.

By its attorneys,

  
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Arthur G. Telegen, BBO #494140  
Matthew L. Adams, BBO #655790  
FOLEY HOAG LLP  
155 Seaport Boulevard  
Boston, MA 02210-2600  
(617) 832-1000

Date: December 23, 2004

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1**

I hereby certify, pursuant to Local Rule 7.1, that counsel for defendant Verizon New England Inc. has attempted in good faith to contact the pro-se plaintiff on December 23, 2004 in an attempt to narrow or resolve the issues that are the subject of this motion.



Matthew L. Adams

**Certificate of Service**

I, Matthew L. Adams, counsel for Defendant, do hereby certify that on this 23rd day of December, 2004, I caused to be sent by mail a copy of the above document to W. Michael Cahill, Pro-Se Plaintiff, 12 Whitewood Circle, Amesbury, Massachusetts 01913, and to Wendy M. Bittner, Esq., counsel for the Union, 15 Court Square, Boston, MA 02108.



Matthew L. Adams